

EXHIBIT O



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	Master File C.A. No. 1:00-1898
In Re: Methyl Tertiary-Butyl Ether)	
("MTBE") Products Liability Litigation)	MDL 1358 (SAS): No. M21-88
_____)	
)	
This Document Relates To:)	
)	
<i>Commonwealth of Puerto Rico, et al. v Shell</i>)	
<i>Oil Co., et al.</i>)	
No. 07 Civ. 10470 (SAS))	
_____)	

**DEFENDANTS' AMENDED NOTICE OF RULE 30(b)(6) DEPOSITION OF
PLAINTIFFS REGARDING KNOWLEDGE OF MTBE
WITH PRODUCTION OF DOCUMENTS AND VIDEOTAPING**

TO ALL PARTIES AND THEIR ATTORNEY(S) OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendants will take the oral deposition of PLAINTIFFS on November 7 - 8, 2013, beginning at 9:00 a.m. at the office of Baker Botts LLP, 1299 Pennsylvania Avenue, NW, Washington, DC 20004. Said deposition shall continue from day to day until completed.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), PLAINTIFFS shall designate and produce at the deposition those of its officers, directors, managing agents, employees or agents who are most qualified to testify on its behalf as to those matters set forth in the notice under the heading "Designated Issues" to the extent of any information known or reasonably available to the deponent.

In addition, PLAINTIFFS must produce documents described in the section of this notice titled, "Requests for Production of Documents." Pursuant to Case Management Order No. 107, Defendants request that PLAINTIFFS produce the requested documents no later than seven (7)

13. PLAINTIFFS' knowledge and understanding of their allegation that MTBE presents "a significant public health threat" to the Commonwealth of Puerto Rico, as alleged at ¶ 86 of the TAC.

14. Whether, when and under what circumstances PLAINTIFFS notified UST owners, gasoline suppliers, or the Puerto Rico general public that MTBE presents "a significant public health threat" to the Commonwealth of Puerto Rico, as alleged at ¶ 86 of the TAC.

15. The date and manner by which PLAINTIFFS first received information that MTBE is "difficult and costly to remove from the water," as alleged in ¶ 111 of the TAC.

16. PLAINTIFFS' knowledge and understanding of their allegation that MTBE is "difficult and costly to remove from the water," as alleged in ¶ 111 of the TAC.

17. All COMMUNICATIONS between PLAINTIFFS and any federal government agency, including but not limited to the EPA, CONCERNING MTBE, TBA, or "contaminants in commercial grade MTBE" other than MTBE or TBA.

18. PLAINTIFFS' attendance, participation in and information acquired at any seminar, conference, training or other event held or organized by EPA regarding MTBE, including without limitation, the training event held by EPA Region II in July 1999 entitled "Assessment and Management of MTBE Impacted Sites."

19. All COMMUNICATIONS between PLAINTIFFS and its employees, agents, elected officials or representatives CONCERNING MTBE, TBA, or "contaminants in commercial grade MTBE" other than MTBE or TBA, including, without limitation, PLAINTIFFS' responses to the Commonwealth of Puerto Rico's legislature's inquiries into MTBE and/or proposed legislation CONCERNING MTBE.

20. All COMMUNICATIONS between PLAINTIFFS and any state and/or trade association CONCERNING MTBE, TBA, or "contaminants in commercial grade MTBE" other than MTBE or TBA.

21. All COMMUNICATIONS between PLAINTIFFS and the Puerto Rico general public CONCERNING MTBE, TBA, or "contaminants in commercial grade MTBE" other than MTBE or TBA.

22. PLAINTIFFS' decision to send letters to various defendants in 1997 requiring disclosure of MTBE usage and content in gasoline marketed in the Commonwealth of Puerto Rico. (*See, e.g.*, PR-MTBE-TRUJ_001445 to 001446).

23. Any testing program initiated in cooperation with EPA to test for the presence of gasoline constituents in any water system, water supply source or potable water in the Commonwealth of Puerto Rico, including but not limited to MTBE, benzene or any other constituent of gasoline.

24. PLAINTIFFS' knowledge of and involvement in the investigation, assessment and/or remediation of gasoline containing MTBE that was detected at or in proximity to the